

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

Case No. 23-20506

Judge: KMP

Chapter 13

In Re, **Sean T. Hoskins**

Debtor(s)

**DEBTOR'S MOTION TO CONTINUE THE AUTOMATIC STAY AS TO ALL
CREDITORS**

Debtor, by his attorney Lombardo Law Office, hereby move the Court, pursuant to 11 U.S.C. § 362(c)(3)(B), for an Order continuing the Automatic Stay, as to all creditors in this case, that is scheduled to terminate on March 8, 2023. In support hereof, the Debtor states as follows:

1. This case, filed February 8, 2023, is a case under Chapter 13 of the Bankruptcy Code.
2. Prior to the current case, the Debtor filed for relief under Chapter 13 of the Bankruptcy Code on September 4, 2020, case number 20-26098-kmp. That case was dismissed on August 18, 2022, pursuant to a motion filed by the Trustee.
3. The reason why the Debtor's previous Chapter 13 failed is because the Debtor and his wife filed for divorce on April 28, 2021 and shortly thereafter the Debtor moved out of their residence, which reduced the Debtor's monthly household take home income by over \$3,100.00 and he had to incur the unexpected expenses of finding his own residence and furnishing it. In addition, the mental stress of losing a marriage of 18 years made focusing on my other financial responsibilities extremely difficult for the Debtor, all of which made completion of the Debtor's previous Chapter 13 case impossible, as indicated in the Debtor's Affidavit, which is attached as an Exhibit and incorporated hereto.

Lombardo Law Office
2230 South 108th Street
Milwaukee, WI 53227
Phone: (414) 543-3328
Fax: (414) 543-0786

4. As indicated in the Debtor's affidavit, the Debtor's divorce was final on February 4, 2022, and the Debtor has established his own household which has stabilized his financial situation. In addition, the Debtor has come to grips mentally and emotionally with the dissolution of my marriage of 18 years and is able to focus on his financial responsibilities going forward.
5. The Debtor believes that now that he is no longer dealing with the emotional and the financial consequences of going through a divorce, he will have sufficient income to meet his household's monthly living expenses as well as sufficient income to submit \$698.00 per month to the Chapter 13 Trustee through weekly payroll deductions for the benefit of his creditors.
6. The Debtor therefore asserts that he has had a substantial change in his personal and financial circumstances since the dismissal of his previous case, such that the present case was in fact filed in good faith.

WHEREFORE, the Debtor request that the Court enter an order continuing the automatic stay under 11 U.S.C. § 362 as to all of the creditors contained in the Debtor's petition and schedules.

Respectfully submitted,

/s/ Adam L. Lombardo

By: _____
Adam Lombardo

February 8, 2023

Date: _____

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Milwaukee, WI 53227
Phone: (414) 543-3328
Fax: (414) 543-0786

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re: Sean Hoskins

Case Number: **23-20506 KMP**
Chapter:13

Debtor(s).

Address: 4131 N 68 Street Milwaukee, WI 53218

Last four digits of Social Security or
Individual Taxpayer Identification
(ITIN) No(s), (if any): 2535

Employer's Tax Identification (EIN) No(s). (if any): _____

Objection to Motion
to Continue Stay Due
(If served by mail,
add three days to
objection deadline
per Rule 9006(f)):
2/28/23

Hearing on Timely-
Filed Objections:
3/7/23 11:30am

NOTICE OF MOTION TO CONTINUE THE AUTOMATIC STAY

To all creditors and parties in interest:

The debtor(s) in the above-captioned case (the "debtor") has filed a motion to continue the automatic stay pursuant to 11 U.S.C. Sec. 362(c)(3)(B). A copy of that motion accompanies this notice.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the motion to continue the automatic stay, or if you want the Court to consider your views on the motion, then **on or before the objection due date stated above**, you or your attorney must file an objection with:

Clerk, United States Bankruptcy Court
517 East Wisconsin Avenue
Milwaukee, WI 53202-4581

and provide copies to: Adam L. Lombardo, Lombardo Law Office
2230 South 108th Street
Milwaukee, WI 53227

in time for its receipt by the above deadline. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

The hearing noted above will be held unless the Court cancels it or issues an order fully adjudicating the motion before the hearing.

The Court will hold a hearing on any timely-filed objection. The Court also will hold a hearing in the absence of an objection unless the debtor files an affidavit or declaration that provides an adequate evidentiary basis for concluding that the debtor has met their burden to prove they commenced this case in good faith as required by 11 U.S.C. Sec. 362(c)(3)(B). If there is no timely objection and the Court finds an adequate evidentiary basis, the Court may cancel the hearing and adjudicate the motion based on the debtor's submissions.

The hearing will take place before Judge Katherine M. Perhach United States Bankruptcy Judge, in the United States Courthouse at **517 East Wisconsin Avenue, Milwaukee, Wisconsin, in Room 167** at the hearing time and date stated above.

The debtor, debtor's counsel, and the objecting party or their counsel must attend the hearing.

Date: 2/9/2023

/s/ Adam L. Lombardo
Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

Case No. 23-20506

Judge: KMP

Chapter 13

In Re, **Sean Hoskins**

Debtor(s)

CERTIFICATE OF SERVICE

The undersigned, Wendi Lombardo of Lombardo Law Office, does hereby certify that a copy of this Certificate of Service and a copy of the attached Motion to Continue Automatic Stay and Notice of Motion to Continue Automatic Stay were mailed First Class to the persons and entities listed below, at their respective addresses, postage prepaid, by depositing them in the U.S. Mail at Milwaukee, WI on February 9, 2023:

Sean Hoskins 4131 N 68 Street Milwaukee, WI 53218

SEE ATTACHED MAILING MATRIX

However, copies have not been mailed to addresses which the Court designated as having been superseded by a preferred address on file, or which the Court designated as undeliverable or duplicate addresses, as indicated in the mailing matrix.

In addition, copies have not been mailed to Lombardo Law Office, attorneys for the Debtors, or to the following parties, to whom service was made by ECF Notice of Electronic Filing:

Scott Lieske, Chapter 13 Trustee
Office of the United States Trustee

Dated this 9th day of February 2023.

/s/
By: _____
Wendi Lombardo

Lombardo Law Office
2230 South 108th Street
Milwaukee, WI 53227
Phone: (414) 543-3328
Fax: (414) 543-0786

abel Matrix for local noticing 757-2 ase 23-20506-kmp astern District of Wisconsin ilwaukee au Feb 9 11:03:18 CST 2023	United States Attorney's Office 517 E. Wisconsin Ave. Room 530 Milwaukee, WI 53202-4509	United States Attorney, Attention, Michael Room 530 Federal Courthouse 517 E. Wisconsin Avenue Milwaukee, WI 53202-4500
isconsin Department Of Revenue pecial Procedures Unit .O. Box 8901 adison, WI 53708-8901	Wisconsin Dept. Of Revenue Special Procedures Unit P.O. Box 8902 Madison, WI 53708-8902	AFNI PO Box 3097 Bloomington, IL 61702-3097
F&T Mobility Box 3517 loomington, IL 61702-3517	Advanced Health Care 3003 W. Good Hope Rd. Milwaukee, WI 53209-2042	(p)ALLIANCE COLLECTION AGENCIES INC ATTN CLIENT SERVICES DEPARTMENT 3916 S BUSINESS PARK AVE MARSHFIELD WI 54449-9029
mericash Loans 228 W Capitol Drive. ilwaukee, WI 53222-1533	Aurora Advanced Healthcare PO Box 091700 Milwaukee, WI 53209-8700	Best Buy Credit Services* PO Box 688911 Des Moines, IA 50368-8911
ridgecrest Acceptance Corp 20 E. Indian School Rd. oenix, AZ 85018-5220	Capital Loans 6512 W Capitol Dr Milwaukee, WI 53216-2038	Capital One PO Box 85064 Richmond, VA 23285-5064
ral Halloway 954 N. 39th St. ilwaukee, WI 53216-2517	Cash for Whatever 6160 N Cicero Ave Chicago, IL 60646-4308	(p)JPMORGAN CHASE BANK N A BANKRUPTCY MAIL INTAKE TEAM 700 KANSAS LANE FLOOR 01 MONROE LA 71203-4774
iti of Milwaukee 01 N. 9th St. ilwaukee, WI 53233-1425	(p)CITIBANK PO BOX 790034 ST LOUIS MO 63179-0034	City of Milwaukee Municipal Court 951 North James Lovell Street Milwaukee, WI 53233-1429
ity of Milwaukee Violations Bureau Box 2080 ilwaukee, WI 53201-2080	(p)CITY OF MILWAUKEE VIOLATIONS BUREAU PO BOX 346 MILWAUKEE WI 53201-0346	Collect Associates 225 S. Executive Dr., Suite 250 Brookfield, WI 53005-4257
ommunity Memorial Hospital * .O. Box 3106 ilwaukee, WI 53201-3106	Corporation Service Company Reg. Agent for TitleMax of Wisconsin Inc 8040 Excelsior Drive, Suite 400 Madison, WI 53717-2915	Enhanced Recovery Corporation 8014 Bayberry Road Jacksonville, FL 32256-7412
armers Insurance Group ayment Processing Center - 27 Box 55126 oston, MA 02205-5126	First Premier Bank 601 S Minnesota Ave. Sioux Falls, SD 57104-4868	Froedtert & Medical College Physicians P.O. Box 13308 Milwaukee, WI 53213-0308

roedtert Hospital
Box 3202
Milwaukee, WI 53201-3202

Geico Casualty Company
5260 Western Ave.
Chevy Chase, MD 20815-3799

Hampton Dental Associates SC
5323 West Hampton Avenue
Milwaukee, WI 53218-5019

ights Finance Corporation
605 W. College Ave.
pleton, WI 54914-4202

IRS - Milwaukee Office
211 West Wisconsin Avenue
M/S 5301 MIL
Milwaukee, WI 53203-2303

Infectious Disease Specialists
PO Box 522
Pewaukee, WI 53072-0522

finity Healthcare Physicians
Box 3261
Milwaukee, WI 53201-3261

Internal Revenue Service
Centralized Insolvency Operation
PO Box 7346
Philadelphia, PA 19101-7346

Medical College Physicians
PO Box 13308
Milwaukee, WI 53213-0308

enomonee Falls Clinic
34 W16889 Menomonee Ave.
enomonee Falls, WI 53051-2810

Milwaukee County Child Support
901 N. 9th St.
Room 101
Milwaukee, WI 53233-1425

Milwaukee Municipal Court
951 N. James Lovell St.
Milwaukee, WI 53233-1429

onitronics International
/o EOS CCA
Longwater Dr.
rwell, MA 02061

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

OAC
PO Box 371100
Milwaukee, WI 53237-2200

ffice of the U. S. Trustee
17 East Wisconsin Ave.
om 430
ilwaukee, WI 53202-4510

One Main Financial
5901 75th St.
Kenosha, WI 53142-3636

(p)PENDRICK CAPITAL PARTNERS LLC
ATTN BRIAN WILSON
8902 OTIS AVE
SUITE 111A
INDIANAPOLIS IN 46216-1077

ick N. Save
5549 W. National Ave.
aw Berlin, WI 53151-5167

ProHealth Care Medical Associates
P.O. Box 409
Menomonee Falls, WI 53052-0409

Professional Placement Services
PO Box 612
Milwaukee, WI 53201-0612

rogressive Insurance
Box 31260
ampa, FL 33631-3260

Rooter Sewer Cleaners
c/o Atty. Gary Shultis
104 Crestwood Dr.
Waukesha, WI 53188-4510

Sallie Mae
P.O. Box 9500
Wilkes Barre, PA 18773-9500

pecialized Loan Servicing
200 S. Quebec Street
aglewood, CO 80111-4720

Sprint
PO Box 1954
Southgate, MI 48195-0954

The Home Depot
PO Box 9001010
Louisville, KY 40290-1010

ie Payday Loan Store
341 S. Business Dr.
neboygan, WI 53081-6527

TitleMax of Wisconsin, Inc.
15 Bull Street, Suite 200
Savannah, GA 31401-2686

TitleMax of Wisconsin, Inc.
7250 N. 76th Street
Milwaukee, WI 53223-4502

University of Phoenix
30 Cross Pointe Rd., Suite G
Columbus, OH 43230

VIP Loan Shop
c/o Northern Resolution Group, LLC
PO Box 566
Amherst, NY 14226-0566

WI SCTF
PO Box 07914
Milwaukee, WI 53207-0914

Waukesha County Circuit Court
15 W. Moreland Blvd.
Waukesha, WI 53188-2428

We Energies
231 W. Michigan St.
Milwaukee, WI 53203-2918

We Energies
333 West Everett
PO Box 2046
Milwaukee, WI 53201-2046

Wells Fargo
PO Box 1697
Spartanburg, NC 28590-1697

Wisconsin Electric Power Co.
231 W. Michigan St.
Milwaukee, WI 53203-2918

Wisconsin Radiology
PO Box 371100
Milwaukee, WI 53237-2200

Wisconsin Urgent Care
PO Box 26428
Milwaukee, WI 53226-0428

Zales
c/o CBNA
PO Box 6497
Sioux Falls, SD 57117-6497

Zita M Cooper-Hoskins
4251 N 22nd street
Milwaukee, WI 53209-6715

James L Lombardo
Lombardo Law Office
230 South 108th Street
Milwaukee, WI 53227-1168

Scott Lieske
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203-0161

Sean T Hoskins
4131 N 68 Street
Milwaukee, WI 53216-1170

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Alliance Collection Agency
916 South Business Park Avenue
Marshfield, WI 54449

Chase Auto Finance
PO Box 901003
Fort Worth, TX 76101

Citibank SD, NA
PO Box 20363
Kansas City, MO 64195-0363

City of Milwaukee Violations Bureau*
Attention: Sacara Jones
PO Box 346
Milwaukee, WI 53201-0346

Most Funding II LLC
c/o Jefferson Capital Systems LLC
PO Box 7999
Saint Cloud, MN 56302

Pendrick Capital Partners
6029 Ridge Ford Dr.
Burke, VA 22015

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

Wisconsin Department of Revenue
Special Procedures Unit
PO Box 8901
Madison, WI 53708-8901

End of Label Matrix	
Mailable recipients	74
Bypassed recipients	1
Total	75